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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC
 MDL No. 1917

This Document Relates to:

Electrograph Systems, Inc., et al. v. Hitachi, Ltd., et al., No. 11-cv-01656;

Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust v. Hitachi, Ltd., et al., No. 11-cv-05502;

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al., No. 11-cv-05513;

Target Corp, et al. v. Chunghwa Picture Tubes, Ltd., et al., No. 11-cv-05514;

Interbond Corporation of America v. Hitachi, et al., No. 11-cv-06275;

**DIRECT ACTION PLAINTIFFS' JOINT
 NOTICE OF MOTION AND MOTION TO
 ADOPT INTERIM SPECIAL MASTER'S
 REPORT AND RECOMMENDATION
 REGARDING DIRECT ACTION
 PLAINTIFFS' MOTION FOR LEAVE TO
 FILE AMENDED COMPLAINTS**

1 *Office Depot, Inc. v. Hitachi Ltd., et al.*, No.
11-cv-06276;

2 *CompuCom Systems, Inc. v. Hitachi, Ltd., et*
3 *al.*, No. 11-cv-06396;

4 *Costco Wholesale Corporation v. Hitachi,*
5 *Ltd., et al.*, No. 11-cv-06397;

6 *P.C. Richard & Son Long Island*
7 *Corporation, et al., v. Hitachi, Ltd., et al.*,
No. 12-cv-02648;

8 *Schultze Agency Services, LLC, et al. v.*
Hitachi, Ltd., et al., No. 12-cv-02649.

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2
3 PLEASE TAKE NOTICE that the Direct Action Plaintiffs hereby move this Court,
4 pursuant to Rule 53 of the Federal Rules of Civil Procedure and the Court's June 16, 2008, Order
5 Appointing Special Master ("Appointment Order"), for an Order adopting the Interim Special
6 Master's June 28, 2013, Report and Recommendation Regarding Direct Action Plaintiffs' Motion
7 for Leave to File Amended Complaints ("June 28 Report and Recommendation"). Specifically,
8 Interim Special Master Quinn recommended that the Court grant the Direct Action Plaintiffs'
9 motion for leave to file amended complaints.

10 The Interim Special Master heard oral argument regarding the Direct Action Plaintiffs'
11 motion on May 8, 2013. On June 28, 2013, the Interim Special Master issued his Report and
12 Recommendation, conducting an extensive, well-reasoned analysis of the relevant law and
13 concluding that (1) leave to amend shall be freely granted when justice so requires—a policy to
14 be applied with extreme liberality; (2) the Direct Action Plaintiffs timely filed their motion for
15 leave to amend; (3) none of the proposed defendants met their burden of showing that the Direct
16 Action Plaintiffs unduly delayed filing the motions to amend; (4) none of the proposed defendants
17 met their burden of showing that they would suffer any undue prejudice by allowing the proposed
18 amendments; (5) Samsung SDI's futility argument is premature and is more appropriately
19 determined on a motion to dismiss or for summary adjudication; (6) there was no opposition to
20 adding Videocon as a non-party co-conspirator; (7) there was no opposition to adding the
21 Panasonic entities as non-party co-conspirators in Costco's case; and (8) there was no opposition
22 to adding facts pertinent to tolling and otherwise removing a few minor allegations from the
23 Direct Action Plaintiffs' complaints.

24 The Interim Special Master therefore recommended that the Court grant the Direct Action
25 Plaintiffs' motion for leave to file the amended complaints that were attached to the March 26,
26 2013, declaration of Eric J. Weiss as follows:

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1 1. To add the following new defendants: Technicolor SA (f/k/a
2 Thomson SA) and Technicolor USA, Inc. (f/k/a Thomson
3 Consumer Electronics, Inc.), Mitsubishi Electric Corp., Mitsubishi
4 Digital Electronics America, Inc. and Mitsubishi Electric &
5 Electronics, USA, Inc.

6 2. To add as a non-party co-conspirator Videocon Industries, Ltd.

7 3. In the case of Costco only to add the following new defendants:
8 Samsung SDI Co., Ltd., Samsung SDI America, Inc., Samsung SDI
9 Mexico S.A. de C.V., Samsung SDI Brazil Ltda., Shenzhen
10 Samsung SDI Co., Ltd., Tianjin Samsung SDI Co., Ltd., and
11 Samsung SDI (Malaysia) Sdn. Bhd.

12 4. In the case of Costco only to add as non-party co-conspirators
13 Panasonic Corp., Panasonic Corp. of North America, MT Picture
14 Display, Co., Ltd., Matsushita Electronic Corp. (Malaysia) Sdn.
15 Bhd. and Panasonic Consumer Electronics Co.

16 5. To add additional allegations relevant to *American Pipe*, cross-
17 jurisdictional and Government Action tolling.

18 June 28 Report and Recommendation at 8–9.

19 Pursuant to paragraph 17 of the Appointment Order, the record relevant to this Motion
20 consists of (1) this Notice of Motion and Motion; (2) the June 28 Report and Recommendation,
21 with included a proposed order (Dkt. No. 1751); (3) Direct Action Plaintiffs' Motion for Leave to
22 File Amended Complaints (Dkt. No. 1609) and accompanying declaration of Eric J. Weiss (Dkt.
23 No. 1613) and exhibits (Dkt. Nos. 1610–11); (4) Opposition of Intervenor Thomson Consumer
24 Electronics, Inc. and Thomson S.A. (Specially Appearing) to Direct Action Plaintiffs' Motion for
25 Leave to File Amended Complaints and accompanying declaration of Laura Oswell and exhibits
26 (Dkt. No. 1629); (5) Mitsubishi Electric's Notice of Motion and Motion for Leave to Intervene
27 and Memorandum of Points and Authorities in Support Thereof (Dkt. No. 1625); (6) Mitsubishi
28 Electric's Motion to Shorten Time (Dkt. No. 1626) and accompanying declaration of Michael
Brody (Dkt. No. 1627); (7) Mitsubishi Electric's Opposition to Direct Action Plaintiffs' Motion
for Leave to File Amended Complaints (Dkt. No. 1628); (8) Real Party in Interest Samsung SDI's
Opposition to Plaintiff Costco's Motion for Leave to File Amended Complaint and accompanying
declaration of Tyler M. Cunningham (Dkt. No. 1632); (9) Direct Action Plaintiffs' Reply in

1 Support of Their Motion for Leave to File Amended Complaints (Dkt. No. 1638) and
 2 accompanying declaration of Eric J. Weiss (Dkt. No. 1639); and (10) the transcript of the May 8,
 3 2013, proceedings before the Interim Special Master. Copies of these documents are attached to
 4 the accompanying declaration of Eric J. Weiss.

5 Accordingly, for the reasons set forth in the Interim Special Master's Report and
 6 Recommendation and the Direct Action Plaintiffs' motion and supporting documents, the Court
 7 should adopt the Interim Special Master's Report and Recommendation in its entirety.

8
 9 DATED: July 12, 2013

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